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Facebook, Inc.; Facebook Holdings, LLC;
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LLC; Siculus, Inc.; and Mark Elliot Zuckerberg*

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signature pages*

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

THIS FILING RELATES TO:

ALL ACTIONS

MDL No. 3047

Case No. 4:22-md-03047-YGR

Honorable Yvonne Gonzalez Rogers

**OMNIBUS STIPULATION
REGARDING SEALING
CONSOLIDATED ADDENDUM TO
PLAINTIFFS' SHORT-FORM
COMPLAINTS STATING CLAIMS
AGAINST MARK ZUCKERBERG**

Pursuant to Civil Local Rules 7-11 and 79-5 and this Court's Order Setting Sealing Procedures (MDL Dkt. 341), Plaintiffs and Defendants Meta Platforms, Inc. f/k/a Facebook, Inc.; Facebook Holdings, LLC; Facebook Operations, LLC; Facebook Payments, Inc.; Facebook Technologies, LLC; Instagram, LLC; Siculus, Inc.; and Mark Elliot Zuckerberg (collectively, "Defendants") submit this Omnibus Stipulation Regarding Sealing Material in the Consolidated Addendum to Plaintiffs' Short-form Complaints Stating Claims Against Mark Zuckerberg ("SFC Addendum") (ECF 794 (redacted, public version); ECF 795-1 (provisionally filed under seal)).

Defendants do not seek to seal material in the SFC Addendum. Defendants do not waive, and expressly reserve, their right to move to seal other material from, or derived from, documents quoted, paraphrased, characterized, or otherwise cited in the SFC Addendum. The confidentiality or appropriateness of sealing material other than that cited in the SFC Addendum is not currently at issue, and Defendants do not waive any right with respect to that material.

The Parties therefore agree that the SFC Addendum may be unsealed and attach an unsealed copy to this stipulation.

IT IS SO STIPULATED AND AGREED.

DATED: May 10, 2024

Respectfully submitted,

COVINGTON & BURLING LLP

/s/ Ashley M. Simonsen

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Attorneys for Plaintiffs

ATTESTATION

I, Ashley M. Simonsen, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

DATED: May 10, 2024

By: /s/ Ashley M. Simonsen

Ashley M. Simonsen